

To: Brown, Anthony R (RM)[anthony.brown@bp.com]
Cc: Lombardi, Marc (marc.lombardi@amecfw.com)[marc.lombardi@amecfw.com]; Jefferson, Jill[Jill.Jefferson@amecfw.com]; Beth Kelly[bk@burlesonconsulting.com]; Greg Reller[gr@burlesonconsulting.com]; Eidelberg, Joseph[Eidelberg.Joseph@epa.gov]; Cory Koger[Cory.S.Koger@usace.army.mil]
From: Deschambault, Lynda
Sent: Tue 5/30/2017 9:47:26 PM
Subject: EPA comments on QAPP and Data Validation
[170127_RIFS QAPP Rev2_Excerpt section 5.2 data validation.pdf](#)

Dear Mr. Brown:

During our last in person meeting on May 23rd ARC and your contractors noted that they are doing 100% data validation which is why ARC isn't sharing data with EPA on a timely basis (i.e. soil and sediment data from 2015, and plant and fish data that the Tribe is requesting). In addition, we agree that this is significantly slowing down the RI/FS. EPA should be receiving 2016 data that was collected 8 months ago. We'd hate to think that ARC is doing more review than is necessary.

Attached is the excerpt from the QAPP that describes the levels of validation.

- The Level II validation (80%) clarifies that it is a comparison of the lab QC summaries against the QAPP criteria and DQI for the project. Our experience is that this is something that a typical QC Summary from the lab would provide—typically automated from any LMS system—and would automatically include in any lab report.
- Level IV validation (20%) is the one that requires reviewing raw data according to the Functional Guidelines and the QAPP criteria. And typically needs a 3rd party review.

As noted in previous comments, it is these findings from the Level IV (20%) that should be used to verify the lab performance, identify matrix interference issues, and larger QC issues that should then be applied to the entire SDG (Sample Delivery Group)

Could you please clarify for us, which lab are you using, and what does that lab provide as standard QAQC summary and review?

Unless it were a smaller set up: small biz, research, state or county laboratory; we are not familiar with any lab that would need outside third party review for completing the basic Level II.

(And even for those small operations---it would typically take less than an hour for a 3rd party to review on their behalf)

Perhaps we could do a call with ARC and your laboratory to discuss how we can assist in streamlining the process.

EPA would also like to offer ARC to please provide us with one of your typical Level II data requests packets.

It would be helpful for us to provide the process ourselves and review with you opportunities for streamlined review.

We'd hate to think that ARC is doing more review than is necessary.

Best Regards,

Lynda Deschambault

Environmental Scientist

USEPA Region 09

(415) 947-4183

Please be advised I may have limited access to email , therefore please be patient with any communication delays.

Could you please clarify for us, Which lab are you using, and what does that lab provide as standard QAQC summary and review?

Unless it were a smaller small biz requirement, or state or county type of laboratory, and should not be recurring. And even then it might take less than an hour to review.

our experience is that the 80% level II is something that a typical QC Summary from the lab would provide—typically automated from any LMS system—and would include in any lab report.

Perhaps we could do a call with ARC and their laboratory to discuss how we can assist in streamlining the process.

EPA would also like to offer ARC to send us just one of your typically Level 2 data requests, and we can do the process and better understand the process.

We'd hate to think that ARC is doing more review than is necessary.

Best Regards,

Lynda Deschambault

Environmental Scientist

USEPA Region 09

(415) 947-4183

Please be advised I may have limited access to email , therefore please be patient with any communication delays.